

EXHIBIT C

Kiely Suppl. Decl. – Exhibit C

Requests in Appendix A (ECF No. 153) (paraphrased)	Plaintiff's Requests for Production (paraphrased in relevant part)	Plaintiff's Requested Search Terms
No. 2 – Documents produced or testimony given by Plaintiff's family members or boyfriends, including Sky Roberts, Anthony Figueroa, and James Michael Austrich	No. 38 – All documents relating to any monies paid by Defendant to Anthony Figueroa No. 79 – All documents relating to communications concerning Anthony Figueroa	<ul style="list-style-type: none"> • Austrich • Figueroa • Lynn /10 Miller • Sky /10 Roberts • "sky_roberts@hotmail.com"
No. 3 – Documents produced or testimony given by Plaintiff's friends, including Rebecca Boylan and Michael Boylan	No. 35 – All documents relating to conversations with Rebecca Boylan No. 36 – All documents relating to communications with Rebecca Boylan No. 37 – All documents relating to any monies paid by Defendant to Rebecca Boylan or her husband	<ul style="list-style-type: none"> • Boylan • "rebecca.boylan@yahoo.com"
No. 4 – Documents produced or testimony given by Epstein staff, including Juan Alessi and David Rodgers	No. 79 – All documents relating to communications concerning Juan Alessi No. 80 – All documents relating to communications concerning Epstein household staff	<ul style="list-style-type: none"> • Kellen • Dana /10 Burns • Vickers • "slv525@icloud.com" • Kensington • Marcinkova • Marcinko • Nadia • Bovino • Groff • "lesley.jee@gmail.com" • Robson

		<ul style="list-style-type: none"> • (Adriana OR Adrianna) /10 (Mucinska OR Ross) • Alessi • (Miles or Kathy) /10 Alexander • Rodgers • Chris! /10 Gay • (Larry OR *gene) /s Morrison • “Jo-Jo” • “Jo Jo” • Luciano • Fontanilla • Alfredo /10 Rodriguez • Banasiak • Stratton • Zinoview • (Alyson OR Allyson) /10 Chambers • Cheri • Cheri /10 Lynch • (Michael or Mike or Rosalie) /10 Friedman • (Adam OR Perry OR Chef) /10 Lang • Mellawa • Peadon • Rabuyo • Visosk! • Sjoberg
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<p>No. 6 – Documents produced or testimony given by Sarah Ransome or Maria Farmer</p>	<p>No. 5 – All documents concerning Sarah Ransome</p> <p>No. 6 – All documents concerning Maria Farmer</p> <p>No. 61 – All communications with any government agency concerning Sarah Ransome or Maria Farmer</p>	<ul style="list-style-type: none"> • Ransome • “ransome.sarah@yahoo.co.uk” • Farmer
<p>No. 7 – Documents produced or testimony given by the following individuals whom Plaintiff has testified she was sexually trafficked to:</p> <ul style="list-style-type: none"> • Prince Andrew • Jean-Luc Brunel • Glenn Dubin • Stephen Kaufmann • Marvin Minsky • George Mitchell • Thomas Pritzker • Bill Richardson • Leslie Wexner 	<p>No. 7 – All documents concerning Leslie Wexner</p> <p>No. 79 – All documents relating to communications concerning Prince Andrew, Jean Luc Brunel, Glenn Dubin, Marvin Minsky, George Mitchell, Thomas Pritzker, Bill Richardson, or Leslie Wexner</p>	<ul style="list-style-type: none"> • Prince /10 Andrew • Andrew AND (Tramp OR royal! OR photo! OR pictur!) • “Duke of York” • “The Duke” • “Jean-Luc” • “JLB” • Brunel • Karin AND model! • “MC Squared” • Dubin • Minsky • G! /3 Mitchell • “George.Mitchell@dlapiper.com” • B! /3 Richardson • “brooke@billrichardson.com” • “governor.richardson@gmail.com” • Pritzker • Wexner
<p>No. 8 – Communications between Giuffre or her agents and members of the media</p>	<p>No. 81 – All communications with any media outlet on any topic relating to this case</p>	<ul style="list-style-type: none"> • Julie /10 Brown • “jbrown@miamiherald.com” • “uptown50@protonmail.com” • Connie /10 Bruck

		<ul style="list-style-type: none"> • connie_bruck@newyorker.com • “conniebruck@gmail.com” • Churcher • “sharonchurcher@hotmail.com” • Sharon.Churcher@mailonsunday.co.uk • “New Yorker” AND (Giuffre OR Roberts OR Epstein) • “Miami Herald” AND (Giuffre OR Roberts OR Epstein) • “Mail on Sunday” • “Daily Mail” AND (Giuffre OR Roberts OR Epstein)
No. 9 – Ghislaine Maxwell’s deposition transcript and exhibits	<p>No. 3 – All documents relating to communications concerning Ghislaine Maxwell</p> <p>No. 8 – All documents concerning any meeting Defendant had with any female associated with Jeffrey Epstein or Ghislaine Maxwell</p> <p>No. 61 – All communications with any government agency concerning Ghislaine Maxwell</p>	<ul style="list-style-type: none"> • Ghislaine • Maxwell • Gmax! • Menninger • “lmenninger@hmflaw.com” • Gow • “ross@acuityreputation.com” • “!hmflaw.com!” • Nic! /10 Simmons • “nsimmons@hmflaw.com” • [all known emails for Maxwell] • Dana /10 Burns
No 10 – Documents describing or media depicting Epstein’s properties or airplanes	No. 69 – All media depicting the inside of Epstein’s residences or aircraft	
No. 11 – Flight logs from Epstein’s aircraft	No. 64 – Flight manifests for Epstein’s aircraft	<ul style="list-style-type: none"> • Rodgers • Chris! /10 Gay • (Larry OR *gene) /10 Morrison • Visosk!

No. 12 – Police reports concerning Giuffre	No. 62 – All documents concerning communications with law enforcement	<ul style="list-style-type: none"> • Recarey • jrecarey@palmbeachpolice.com • Reiter • mreiter@palmbeachpolice.com • Jason /10 Richards • Jason.Richards2@ic.fbi.gov • “U.S. Secret Service” • (“U.S. Attorney” or “US Attorney”) /25 (Florida or “SD Fla”) • “.gov” AND (“Palm Beach” OR “New Mexico” OR Rodriguez) • “Scotland Yard” • “Palm Beach Police”
No. 13 – Emails exchanged between Sarah Ransome and any member of the media, including Maureen Callahan of the New York Post	<p>No. 5 – All documents concerning Sarah Ransome</p> <p>No. 42 – All documents concerning communications with Maureen Callahan concerning Sarah Ransome</p>	<ul style="list-style-type: none"> • Maureen /10 Callahan • mcallahan@nypost.com • Ransome • ransome.sarah@yahoo.co.uk • “New York Post” AND (Giuffre OR Roberts OR Epstein)